

March 25, 2003

Gary Gray, Engineer/Resident Agent
West Ridge Resources, Inc.
P.O. Box 1077
Price, Utah 84501

Re: Conditional Approval, Division Order to Address Classification of Roads as Primary or Ancillary Roads, West Ridge Resources, Inc., West Ridge Mine, C/007/041-DO02C, Outgoing File

Dear Mr. Gray:

The above-referenced amendment is conditionally approved, effective March 24, 2003, upon receipt of five clean copies for incorporation. Once we receive these copies, we will send a stamped incorporated copy to you for insertion into your copy of the Mining and Reclamation Plan. A copy of our Technical Analysis is enclosed for your information.

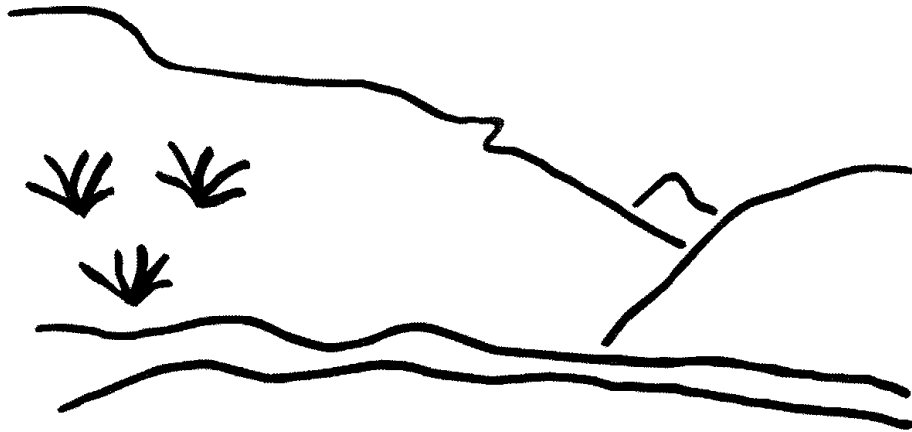
If you have any questions, please call me at (801) 538-5268 or Karl R. Houskeeper at (435) 613-5330.

Sincerely,

Pamela Grubaugh-Littig
Permit Supervisor

KRH/sd
Enclosure
cc: Price Field Office
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State of Utah



Utah Oil Gas and Mining

Coal Regulatory Program

West Ridge Mine
Division Order to Address Classification of Roads as Primary or Ancillary Roads
C/007/041-DO02C
Technical Analysis
March 24, 2003

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TECHNICAL ANALYSIS

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The Division regulates the Surface Mining Control and Reclamation Act of 1977 (SMCRA). When mines submit a Permit Application Package or an amendment to their Mining and Reclamation Plan, the Division reviews the proposal for conformance to the R645-Coal Mining Rules. This Technical Analysis is such a review. Regardless of these analyses, the permittee must comply with the minimum regulatory requirements as established by SMCRA.

Readers of this document must be aware that the regulatory requirements are included by reference. A complete and current copy of these regulations and a copy of the Technical Analysis and Findings Review Guide can be found at <http://ogm.utah.gov/coal>

This Technical Analysis (TA) is written as part of the permit review process. It documents the Findings that the Division has made to date regarding the application for a permit and is the basis for permitting decisions with regard to the application. The TA is broken down into logical section headings which comprise the necessary components of an application. Each section is analyzed and specific findings are then provided which indicate whether or not the application is in compliance with the requirements.

Often the first technical review of an application finds that the application contains some deficiencies. The deficiencies are discussed in the body of the TA and are identified by a regulatory reference which describes the minimum requirements. In this Technical Analysis we have summarized the deficiencies at the beginning of the document to aid in responding to them. Once all of the deficiencies have been adequately addressed, the TA will be considered final for the permitting action.

It may be that not every topic or regulatory requirement is discussed in this version of the TA. Generally only those sections are analyzed that pertain to a particular permitting action. TA's may have been completed previously and the revised information has not altered the original findings. Those sections that are not discussed in this document are generally considered to be in compliance.

INTRODUCTION

INTRODUCTION

During a November 2002 inspection of the West Ridge Mine, it was noted that traffic had occurred in excess of a six-month period on several roads within the disturbed area. The Division issued Division Order DO02C on November 22, 2002 to West Ridge Resources, Inc. This included the graveled road that extends from the paved Carbon County road to the bathhouse, the portals, and the warehouse and storage yards, as well as three other roads within the disturbed area.

The permittee responded to the Division Order on February 18, 2003. West Ridge Resources, Inc. submitted a revision to the February 18, 2003 submittal on March 20, 2003. The revision contained additional information required by regulation to properly address the Division Order.

OPERATION PLAN

OPERATION PLAN

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

Road Classification System

The inspection that was conducted by the Division in November of 2002 brought to light the fact that the mining and reclamation plan had failed to adequately classify several roads within the mine site disturbance that are used on a regular basis. Although the inspection specifically addressed the main canyon access road which leads from a tangent with the coal truck loading loop to the storage yard located at the top of the right hand fork of the mine site, the Division Order specifically required the permittee to address all roads within the disturbed area boundary.

Map 5-15 includes a plan view of most of the disturbed area of the mine site. The areas of disturbance that have not been included are a section of the Carbon County road from the gate to the Office pad access (about 300 feet of disturbance are not shown). The other section of disturbance not shown lies in the upper end of the right hand fork above the topsoil storage pile. This is an alternate sediment control area (ASCA X) and includes the test plot area. There are no roads in this area.

The area where all mining related activities occur encompasses four roads, all of which are depicted in the plan view shown on Map 5-15. Eight engineering cross sections are depicted on this Map. A horizontal and a vertical scale of one-inch equals twenty-five feet are utilized. Each cross section will be evaluated with respect to the road to which it pertains.

Primary Roads

The Carbon County or "C" Canyon road above the access gate is depicted by cross sections A-A' and B-B'. **The County road terminates at the junction where the two legs of the truck-loading loop come together**, as indicated on page 5-33 of the submittal received on 02/18/2003. This portion of the County road has always been classified as a primary road and was not a road to be classified within the Division Order. As noted, however, two cross sections have been provided relative to the length of County road within the disturbed area boundary.

OPERATION PLAN

Cross section C-C' includes a road section for both the inbound and outbound lanes of the truck loading loop. The permittee has classified this road as a **primary** road, based upon R645-301-527.121, (used for transporting coal), and -301-527.122, (frequently used for other purposes for a period in excess of six months). Cross section C-C' depicts a road way width of twenty feet for the inbound lane and a roadway width of 21.25 feet for the outbound lane, (where the trucks are loaded). Although both of the sections appear to be horizontal on Map 5-15, an examination of FIGURE 5-3, Typical Section, "C" Canyon road, West Ridge Mine site reveals that the road surface (asphalted concrete) has a 2% slope in both directions from the center of the haul road. Designed ditches exist on the NW side of the inbound lane (ditch **DD-12**), and on the SE side of the outbound lane (ditch **DD-13**). A shallow depression exists between the inbound and outbound lanes, with the collected runoff from the area reporting to a grate on the inlet of culvert **DC-11**. This flow then combines with the flow collected by DD-13, reporting it through culvert DC-13 into the upper cell (Cell A) of the sediment pond. Adequate drainages have been incorporated to complement the road design to prevent water/ice build-up on the road surface, minimizing vehicle control problems and road surface degradation.

Figure 5-3, Typical Section, "C" Canyon road, West Ridge Mine site depicts the layers of road surfacing materials and other specifications to which the "C" Canyon County road, as well as that portion of the County road within the mine's disturbance and the truck loading loop have been constructed. The load-bearing surface of all segments of this primary coal haul transportation facility contains three layers of material. The first layer or top surface consists of six inches of asphalted concrete, with a material gradation having a maximum size of $\frac{3}{4}$ inch. Immediately below the top surface, six inches of untreated road base, course, having a maximum size of $\frac{3}{4}$ of an inch to one inch was required and implemented. The bottom layer of the road surface design incorporates granular borrow material, placed and compacted to a depth of twelve inches. Width and grade specifications for the transportation lane, road shoulders, out slopes and other critical information relative to the road design are also depicted in Figure 5-3. Figure 5-3 is stamped, signed, and dated by a Utah registered professional engineer. This design has already been approved by the Division and has been described here to meet the requirement of the Division Order to address the cross sections and design portion of R645-301-527.200 and -527.210. The designs for ditches DD-12 and DD-13 are included in the approved version of Appendix 7-4, Sedimentation and Drainage Control Plan (As Constructed), **incorporated February 6, 2003**. See Table 13, Disturbed Ditch Design Summary, page 33 of Appendix 7-4 for design criteria relative to peak flows, flow velocities, required cross sections for ditch maintenance, and flow depths for the aforementioned ditches. All down gradient flow control devices have similar design information in this appendix and are similarly, already approved.

OPERATION PLAN

The remainder of the mine site disturbed area is accessed by three roads. As indicated on the revised page 5-42 of the submittal received February 18, 2003, the two other roads which have now been classified as primary are the road which starts at the tangent with the truck loading loop and terminates at the warehouse pad (**this will be referred to as the Main Canyon Access**), and the ramp from this same road up to the coal storage yard in the left hand fork of "C" Canyon.

The Main Canyon Access is classed as a primary road as indicated on Page 5-42 of the submittal received 02/18/2003. Cross sections **D-D'** and **E-E'**, as shown on MAP 5-15, Roads, depict the constructed area where frequent vehicular traffic occurs. **D-D'** is located approximately 865 feet NE of the junction where the Main Canyon Access intercepts the truck loading loop. A road width of 27.5 feet is depicted, with a concrete Jersey barrier on the east shoulder; the west edge of **D-D'** depicts a flow path, which is relative to disturbed area ditch **DD-6**, as depicted on the approved Map 7-2, Mine Site Drainage Map.

Cross section **E-E'** is located 650 feet farther up the Canyon, NE of **D-D'**, just down slope from the junction with the largest of the material storage pads. A thirty-foot road way width is depicted, with a flow path on the western edge, congruent with disturbed area ditch **DD-4**. The Main Canyon Access road is surfaced with two inch minus crushed white sandstone.

The remaining primary road in the mine site disturbance is only about 240 feet in length, and is the ramp from the Main Canyon Access to the coal storage pad located in the left fork of "C" Canyon. Its cross-section is depicted as **H-H'**, as shown on Map 5-15. This road is depicted as "primary" on the aforementioned drawing, as well as within the text of page 5-42, under section -534.300, Primary Roads. A road way width of 22.5 feet is depicted by the section, with ditch **DD-8** on the western edge and a berm on the eastern edge (crest of the out slope).

Ancillary Roads

The only road remaining to be classified inside the mine's disturbed area is the road from the pad NE of the main fan installation to the area referred to as the "nose" by the permittee. The "nose" is the location of the belt drive for the primary run-of-mine coal-carrying conveyor. The permittee has also located a flagpole and a memorial to Mary Jean Mitchell Green in this area. Page 5-33 and Map 5-15 (received 3/20/2003) both classify the access road to the "nose" area as ancillary.

Cross sections **F-F'** and **G-G'** as shown on Map 5-15 depict the ancillary road to the nose. This road does not see the volume of traffic, nor the same types of vehicle weights that are seen by primary roads such as the Main Canyon Access.

OPERATION PLAN

Cross section F-F' depicts a roadway width of twelve feet, with an average grade of 4.63 percent. The slope toward the disturbed area ditch designated as **DD-3** is 8.3 percent.

Cross section G-G' depicts a road way width of 17.5 feet, with a slope of 2.8 percent reporting the drainage to ditch DD-3. Both cross sections depict berms at the crest of the outslope which are two feet in height. Berm heights are only regulated by the Division with respect to the prevention of flows over outslopes, and are generally considered to be under the jurisdiction of the Mine Safety and Health Administration as they relate to axle heights and loss of control of machinery.

The ancillary road to the "nose" is surfaced with the same material that has been used for the Main Canyon Access.

Map 5-15, ROADS, as received on March 20, 2003 contains a table that classifies each of the roads described above and includes the average longitudinal grade for each. The type of surfacing material utilized on each road is also described.

Primary Road Certification

The permittee has provided a new map that has been designated as **MAP 5-15, Roads**. The map is signed and dated by Mr. Dan Guy, a Utah registered professional engineer.

Findings:

The submitted information received on February 18, and March 20, 2003 adequately address the permit deficiency described in Division Order DO02C issued on November 22, 2002.

